

# **EXHIBIT 1**

# **FILED UNDER SEAL**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

\_\_\_\_\_  
WAYMO LLC, )  
)  
Plaintiff, )  
vs. ) Case No.  
) 17-cv-00939-WHA  
UBER TECHNOLOGIES, INC.; )  
OTTOMOTTO, LLC; OTTO TRUCKING LLC, )  
)  
Defendants. )  
\_\_\_\_\_)

HIGHLY CONFIDENTIAL--OUTSIDE COUNSEL'S EYES ONLY

VIDEOTAPED DEPOSITION of  
ADAM BENTLEY, ESQ.  
San Francisco, California  
Tuesday, August 22, 2017  
Volume I

Reported by:  
MARY J. GOFF  
CSR No. 13427  
Job No. 2684904C  
PAGES 1 - 85

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)

Highly Confidential Videotaped Deposition of  
ADAM BENTLEY, ESQ., Volume I, taken on behalf of  
Plaintiff Waymo LLC, at Quinn Emanuel Urquhart &  
Sullivan, LLP, California Street, 21st Floor,  
beginning at 4:13 p.m. and ending at 6:25 p.m., on  
August 22, 2017, before MARY GOFF, Certified  
Shorthand Reporter No. 13427.

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13 ALSO PRESENT:

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15 Counsel, Uber

16  
17 Videographer:

18 Robert Talbot

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|    |   |   |          |
|----|---|---|----------|
| 1  | Q | And I will not repeat them now. Can you       | 04:14:09 |
| 2  |   | briefly describe your educational background? | 04:14:13 |
| 3  | A | I went to Duke University for an undergrad    | 04:14:17 |
| 4  |   | and University of Virginia for law school.    | 04:14:19 |
| 5  | Q | What year did you graduate from law           | 04:14:21 |
| 6  |   | school?                                       | 04:14:23 |
| 7  | A | 2007.   | 04:14:24 |
| 8  | Q | What was your first job after law school?     | 04:14:25 |
| 9  | A | Corporate associate at Simpson & Thacher.     | 04:14:29 |
| 10 | Q | How long were you there?                      | 04:14:32 |
| 11 | A | Approximately seven years.                    | 04:14:33 |
| 12 | Q | What city was that in?                        | 04:14:34 |
| 13 | A | In Palo Alto.                                 | 04:14:36 |
| 14 | Q | What did you do after you left Simpson        | 04:14:37 |
| 15 |   | Thacher.                                      | 04:14:42 |
| 16 | A | Went to O'Melveny & Myers LLP as corporate    | 04:14:43 |
| 17 |   | counsel.                                      | 04:14:47 |
| 18 | Q | How long were you at O'Melveny?               | 04:14:49 |
| 19 | A | Approximately two years.                      | 04:14:51 |
| 20 | Q | And then you joined Ottomotto; is that        | 04:14:53 |
| 21 |   | right?  | 04:14:56 |
| 22 | A | That's right.                                 | 04:14:57 |
| 23 | Q | When did you first meet Anthony               | 04:14:58 |
| 24 |   | Levandowski?                                  | 04:15:00 |
| 25 | A | I first met him in probably March of 2016.    | 04:15:03 |

## HIGHLY CONFIDENTIAL - OUTSIDE COUNSEL ONLY

1 Q And that was in connection with the Newco 04:15:11  
2 deal? 04:15:18

3 A That was in connection with the 04:15:20  
4 transaction we were negotiating with Uber, yes. 04:15:22

5 Q Since you became an Uber employee, have 04:15:27  
6 you ever had a conversation with Anthony Levandowski 04:15:31  
7 relating to his indication of the Fifth Amendment? 04:15:34

8 MR. TAKASHIMA: Objection. I'm going to 04:15:38  
9 caution the witness not to disclose anything 04:15:40  
10 discussed in an privileged communication. 04:15:43

11 MR. JUDAH: I will note there has been a 04:15:44  
12 finding of privilege -- a subject matter waiver over 04:15:46  
13 this. So I'll let the witness answer based on that 04:15:47  
14 instruction if he chooses, but I don't think there's 04:15:51  
15 any basis to object on privilege. 04:15:54

16 MR. TAKASHIMA: I'm going to note that 04:15:56  
17 there's still a briefing on the scope of the subject 04:15:57  
18 matter waiver. In the meantime, I will repeat my 04:15:59  
19 objection. 04:16:01

20 A I have not had a conversation with Anthony 04:16:03  
21 about that. 04:16:05

22 Q (BY MR. JUDAH) Have you ever had a 04:16:09  
23 conversation with Mr. Levandowski since you became 04:16:09  
24 an Uber employee on the subject matter of his 04:16:12  
25 reasons for downloading files from Google? 04:16:18



## HIGHLY CONFIDENTIAL - OUTSIDE COUNSEL ONLY

1 MR. TAKASHIMA: Again, I'm going to object 04:16:22

2 on the grounds of privilege. I caution the witness 04:16:23

3 not discuss -- discuss anything disclosed in a 04:16:27

4 privileged communication. I think you can answer 04:16:30

5 that "yes" or "no." 04:16:32

6 MS. EWINS: Do you want the question read 04:16:38

7 back? 04:16:40

8 A Actually, I would like to confer with 04:16:40

9 counsel about a privilege question. 04:16:43

10 Q (BY MR. JUDAH) Which counsel do you want 04:16:44

11 to confer with? 04:16:46

12 A Uber counsel. 04:16:47

13 MR. JUDAH: Okay. We can go off the 04:16:50

14 record. 04:16:51

15 THE VIDEOGRAPHER: The time is 4:17 p.m., 04:16:52

16 and we are off the record. 04:16:53

17 (A break was taken from 4:17 p.m. to 04:16:54

18 4:22 p.m.) 04:16:54

19 THE VIDEOGRAPHER: The time is 4:22 p.m. 04:22:03

20 We are back on the record. 04:22:04

21 Q (BY MR. JUDAH) So we had a question 04:22:06

22 pending, and I'm not sure whether you want to answer 04:22:07

23 it or whether counsel wants to -- 04:22:08

24 MR. TAKASHIMA: No. If you want to re-ask 04:22:10

25 it, I think -- 04:22:11

1 Q (BY MR. JUDAH) Sure. So, Mr. Bentley, 04:22:13  
2 have you ever had a conversation with 04:22:18  
3 Mr. Levandowski since you became an Uber employee on 04:22:20  
4 the subject matter of his reasons for downloading 04:22:23  
5 files from Google? 04:22:25  
6 MR. TAKASHIMA: I'm going to object to the 04:22:27  
7 extent that calls for privileged communications and 04:22:28  
8 caution the witness not to divulge the substance of 04:22:31  
9 any privileged communications. And I believe you 04:22:33  
10 can answer that "yes" or "no." 04:22:36  
11 A Yes. 04:22:39  
12 Q (BY MR. JUDAH) And what were the substance 04:22:39  
13 of those communications? 04:22:40  
14 MR. TAKASHIMA: I'm going to instruct the 04:22:41  
15 witness not to answer on privilege grounds. 04:22:42  
16 Q (BY MR. JUDAH) How many different 04:22:44  
17 conversations are we talking about? 04:22:46  
18 MR. TAKASHIMA: Again, I'm going to 04:22:49  
19 caution the witness not to divulge the substance of 04:22:50  
20 any privileged communications. If there's a number 04:22:52  
21 you can give, you can. 04:22:57  
22 A It was perhaps a few meetings. 04:22:58  
23 Q (BY MR. JUDAH) How many meetings do you 04:23:03  
24 remember specifically? 04:23:04  
25 MR. TAKASHIMA: Same instruction. 04:23:06

1           A     To the best that I can recall, it would be           04:23:09  
2     around three or four.   Several.                               04:23:11  
3           Q     (BY MR. JUDAH) When did those meetings           04:23:16  
4     take place?   04:23:18  
5                   MR. TAKASHIMA:   Same objection and same           04:23:20  
6     caution to not divulge the substance of any               04:23:22  
7     privileged communications.                                   04:23:25  
8           A     Generally in late February and early               04:23:27  
9     March 2017.   04:23:30  
10          Q     (BY MR. JUDAH) So focusing on the first of       04:23:36  
11     those conversations, what do you remember about the       04:23:37  
12     location of that meeting?                                   04:23:44  
13                   MR. TAKASHIMA:   Objection, form.               04:23:46  
14          A     What do I remember about the location?           04:23:51  
15          Q     (BY MR. JUDAH) Yeah.   Where -- where did       04:23:53  
16     that conversation take place?                               04:23:54  
17                   MR. TAKASHIMA:   Objection, form.               04:23:57  
18          A     So I can remember generally the locations       04:24:00  
19     where those meetings were held, but not necessarily       04:24:03  
20     the order of them.   04:24:07  
21          Q     (BY MR. JUDAH) So -- what so -- so I -- so       04:24:11  
22     I understand what you're saying.   And I'm just           04:24:13  
23     trying to get your best recollection based on what       04:24:16  
24     you remember of the meetings.                               04:24:19  
25                   What were the locations you remember these       04:24:21

1 meetings taking place? 04:24:23

2 MR. TAKASHIMA: Objection, form. 04:24:25

3 A In this late February and early March 2017 04:24:30

4 time frame that I'm talking about, I recall meetings 04:24:33

5 generally at the Harrison Street location that Otto 04:24:38

6 and Uber were using at that time, and also at 04:24:46

7 offices of a law firm. 04:24:53

8 Q (BY MR. JUDAH) Which law firm? 04:24:54

9 MR. TAKASHIMA: Objection, form. But you 04:25:00

10 can answer the question. 04:25:02

11 A MoFo. 04:25:03

12 Q (BY MR. JUDAH) Do you remember how many of 04:25:03

13 these conversations happened at the Harrison Street 04:25:05

14 location and how many happened at Morrison 04:25:09

15 Foerster's offices? 04:25:12

16 MR. TAKASHIMA: Objection, form. Just so 04:25:15

17 the record clear, can you be more specific about 04:25:17

18 these meetings or these conversations? 04:25:21

19 A To the best of my recollection, it may 04:25:25

20 have been one or two at each of those two locations. 04:25:26

21 Q (BY MR. JUDAH) And what do you remember 04:25:30

22 about the people who -- that were present at any of 04:25:30

23 these meetings you had where the subject matter of 04:25:36

24 Anthony Levandowski's reasons for downloading Waymo 04:25:39

25 files was discussed? 04:25:43

1 MR. TAKASHIMA: Objection to the extent 04:25:45  
2 that it calls for privileged communications. I will 04:25:48  
3 caution the witness again not to divulge the 04:25:49  
4 substance of any privileged communications, but you 04:25:53  
5 can identify the people involved in conversations, 04:25:55  
6 if you recall. 04:25:58

7 A To the best of my recollection, the 04:26:14  
8 meeting that would have most focused on that, I 04:26:15  
9 believe it was Eric Tate from MoFo; I believe Nicole 04:26:17  
10 Bartow from Uber. 04:26:25

11 Q (BY MR. JUDAH) So that -- you're -- you're 04:26:31  
12 now referring to a specific meeting you recollect on 04:26:34  
13 the subject matter attended by Mr. Tate and 04:26:36  
14 Ms. Bartow? 04:26:40

15 A Yes. 04:26:41

16 Q Focusing on that specific meeting, where 04:26:42  
17 did that take place? 04:26:44

18 A That meeting was at MoFo's offices. 04:26:48

19 Q What do you -- well, do you remember -- 04:26:54  
20 let me ask you this: Focusing on that meeting in 04:26:56  
21 Morrison & Foerster's offices attended by Mr. Tate 04:27:00  
22 and Ms. Bartow, do you remember anyone else being 04:27:02  
23 present at any time? 04:27:05

24 A Oh, Anthony and myself. 04:27:06

25 Q Do you remember how long that meeting 04:27:14

|    |  |          |
|----|--|----------|
| 1  | lasted?  | 04:27:16 |
| 2  | A No. It wasn't particularly long or short.          | 04:27:21 |
| 3  | Maybe a half an hour to an hour.                     | 04:27:23 |
| 4  | Q Was that a scheduled meeting?                      | 04:27:25 |
| 5  | A So it was scheduled in that people knew            | 04:27:31 |
| 6  | what time we were meeting and where to meet.         | 04:27:33 |
| 7  | MR. JUDAH: So I understand you're                    | 04:27:37 |
| 8  | instructing him not to answer the contents of that   | 04:27:39 |
| 9  | meeting on the subject matter. I'll note that, you   | 04:27:43 |
| 10 | know, Judge Alsup overruled a motion for relief and  | 04:27:47 |
| 11 | ruled that Waymo is entitled to ask these questions. | 04:27:51 |
| 12 | So you know, we'll be seeking relief                 | 04:27:54 |
| 13 | accordingly, but I'll just for the record that we'll | 04:27:57 |
| 14 | be moving the compel, and we understand your         | 04:28:00 |
| 15 | position about the instruction.                      | 04:28:03 |
| 16 | Q (BY MR. JUDAH) So, Mr. Bentley, now,               | 04:28:04 |
| 17 | focusing on the next meeting you can remember where  | 04:28:07 |
| 18 | you discussed the subject matter of                  | 04:28:10 |
| 19 | Mr. Levandowski's reasons for downloading Google     | 04:28:12 |
| 20 | files, who attended that meeting?                    | 04:28:15 |
| 21 | MR. SCHUMAN: Objection as to form.                   | 04:28:18 |
| 22 | MR. TAKASHIMA: Objection as to form. And             | 04:28:23 |
| 23 | I'm going to caution the witness again not to        | 04:28:25 |
| 24 | disclose the substance of any privileged             | 04:28:27 |
| 25 | communications.                                      | 04:28:29 |

1           A       The meeting I just described was the only           04:28:31  
2       meeting that I recall getting into that specific           04:28:34  
3       issue, in substance.           04:28:37

4           Q       (BY MR. JUDAH) Well, okay. Well, were           04:28:41  
5       there any other meetings where Mr. Levandowski's           04:28:43  
6       reasons for downloading the files was discussed at           04:28:45  
7       all?           04:28:48

8                   MR. SCHUMAN: Objection as to form.           04:28:52

9                   MR. TAKASHIMA: And the same caution.           04:28:54

10          A       For those handful of meetings that I           04:28:56  
11       attended in late February, early March 2017, I don't           04:28:59  
12       recall any other meetings where the substantive           04:29:06  
13       reasons may have been provided.           04:29:09

14          Q       (BY MR. JUDAH) So I just want to --           04:29:13

15          A       And I would extend on that. Other than           04:29:15  
16       in -- in a nonprivileged meeting that Anthony had           04:29:17  
17       with all -- a number of employees, it was a -- I           04:29:19  
18       believe it was an ATG all-hands meeting where my           04:29:23  
19       recollection of what he said was that he would           04:29:27  
20       sometimes work from home and take, you know, Google           04:29:31  
21       resources with him and work from home.           04:29:37

22                   And I understood that to be an explanation           04:29:40  
23       for why he may have downloaded materials. But I           04:29:42  
24       don't know that it was specific to that specific           04:29:47  
25       allegation.           04:29:52

1 Q So I just want to make sure I understand 04:29:54  
2 your testimony, because I -- I thought when I asked 04:29:56  
3 you a few minutes ago, you said you remembered maybe 04:29:58  
4 three to four different conversations you had. 04:30:02

5 A Right. So I was referring there to 04:30:03  
6 privileged meetings that I attended. And I want it 04:30:06  
7 to be clear there was separately this ATG all-hands 04:30:09  
8 meeting where Anthony addressed in some way the 04:30:12  
9 Waymo litigation. 04:30:19

10 Q So I understand. So you told me about one 04:30:21  
11 of these privileged discussions that you had. And 04:30:24  
12 that's the one attended by Mr. Tate, and 04:30:30  
13 Mr. Levandowski, Ms. Bartow, and you. 04:30:34

14 So now my question is: What do you 04:30:35  
15 remember in terms of attendance from -- from any of 04:30:37  
16 the other privileged conversations that you had on 04:30:41  
17 the subject matter of Anthony Levandowski 's reasons 04:30:44  
18 for downloading Waymo files? 04:30:46

19 MR. TAKASHIMA: Objection to form. 04:30:49

20 A So the handful of privileged meetings that 04:30:52  
21 we were just discussing, there's only one meeting 04:30:55  
22 that I can recall a real discussion on that topic. 04:31:00

23 Outside of the privileged meetings, there 04:31:04  
24 was an ATG all-hands meeting where Anthony explained 04:31:06  
25 to a large number of Uber employees that he would 04:31:11



1 sometimes work from home; and in doing so, would 04:31:14  
2 access Google resources from home. 04:31:17  
3 Q (BY MR. JUDAH) So, Mr. Bentley, I asked 04:31:20  
4 you earlier -- around 4:22 p.m., I said, 04:31:37  
5 Mr. Bentley, have you ever had a conversation with 04:31:42  
6 Mr. Levandowski since you became an Uber employee on 04:31:44  
7 the subject matter of his reasons for downloading 04:31:47  
8 files from Uber? 04:31:49  
9 And after some objections, your answer 04:31:51  
10 was, I do. It was perhaps a few meetings. 04:31:55  
11 And then I asked: How many meetings do 04:31:58  
12 you remember specifically? 04:31:59  
13 And you said, To the best that I can 04:32:01  
14 recall, it would be around three or four. Several. 04:32:02  
15 Do you remember testifying to that? 04:32:05  
16 A Yes. 04:32:08  
17 Q So now what I'm trying to get is 04:32:09  
18 information -- you have told me about one meeting 04:32:11  
19 that you say was privileged. 04:32:14  
20 Now you have mentioned this all-hands 04:32:16  
21 meeting. So now I'm asking about all the other 04:32:17  
22 meetings you remember where you discussed with 04:32:20  
23 Mr. Levandowski, the subject matter of his reasons 04:32:22  
24 for downloading files from Waymo. 04:32:26  
25 A So -- 04:32:29

1 MR. TAKASHIMA: Objection, form. 04:32:31

2 A -- yeah, and just let me -- 04:32:33

3 MR. TAKASHIMA: Can you just restate the 04:32:33

4 question? 04:32:35

5 Q (BY MR. JUDAH) So other than this meeting 04:32:39

6 that you have testified about with Mr. Tate, 04:32:41

7 Ms. Bartow, Mr. Levandowski, and you where the 04:32:45

8 subject matter of Mr. Levandowski's reasons for 04:32:51

9 downloading Waymo files were discussed and the 04:32:53

10 all-hands ATG meeting, what other meetings have you 04:32:55

11 had that you can remember that involved 04:33:00

12 Mr. Levandowski and that involved the subject matter 04:33:03

13 of his reasons for downloading files from Waymo? 04:33:05

14 MR. TAKASHIMA: Objection to the extent it 04:33:10

15 calls for privileged communications. But if you can 04:33:11

16 recall any such meetings, you can identify them. 04:33:14

17 A I don't recall any other such meetings. 04:33:18

18 Q (BY MR. JUDAH) So -- so earlier when 04:33:21

19 you -- you testified that there were several, and 04:33:22

20 you thought maybe three or four, what you're saying 04:33:24

21 now is that what you really meant was you could 04:33:27

22 think of two? 04:33:29

23 A So there were -- 04:33:30

24 MR. TAKASHIMA: Objection, form. 04:33:31

25 A -- there were three or four meetings that 04:33:32

|   |  |          |
|---|--|----------|
| 4 | And the others were, in my mind, more                | 04:33:41 |
| 5 | generally related to the Waymo litigation and not as | 04:33:44 |
| 6 | such specifically to that -- the topic you were      | 04:33:47 |
| 7 | asking about.  | 04:33:48 |

|    |  |          |
|----|--|----------|
| 11 | Q (BY MR. JUDAH) So, Mr. Bentley, I just           | 04:33:58 |
| 12 | want to make sure I'm clear in my questioning. I'm | 04:33:59 |
| 13 | not asking you about meetings that were really     | 04:34:02 |
| 14 | focused on the subject matter of Mr. Levandowski's | 04:34:06 |
| 15 | reasons for downloading Waymo files.               | 04:34:09 |

|    |   |          |
|----|---|----------|
| 16 | I'm asking: Do you remember attending any           | 04:34:12 |
| 17 | meetings with Mr. Levandowski that addressed at all | 04:34:16 |
| 18 | the subject matter of Mr. Levandowski's reasons for | 04:34:20 |
| 19 | downloading Waymo files?                            | 04:34:23 |

20 MR. TAKASHIMA: Again, objection to the 04:34:26

21 extent it calls for privileged communications, but 04:34:27

22 you can answer that "yes" or "no." 04:34:31

|    |   |  |          |
|----|---|--|----------|
| 23 | A | My only recollection of Anthony discussing           | 04:34:33 |
| 24 |   | his reasons regarding that allegation would be in -- | 04:34:36 |
| 25 |   | in the one privileged meeting I can recall and in    | 04:34:42 |

1 the all-hands meeting that I mentioned. 04:34:45

2 Q (BY MR. JUDAH) Do you remember any 04:34:49

3 conversations -- let me ask this way: Do you 04:34:50

4 remember any meetings with Mr. Levandowski, 04:34:53

5 regardless of who said it, where anyone discussed 04:34:56

6 the subject matter of Mr. Levandowski's reasons for 04:35:03

7 downloading files from Waymo? 04:35:05

8 MR. TAKASHIMA: Objection, form. Again, 04:35:08

9 I'm going to caution the witness not to divulge any 04:35:10

10 privileged communications. 04:35:12

11 A That's -- 04:35:14

12 MR. TAKASHIMA: You can answer that "yes" 04:35:15

13 or "no." 04:35:16

14 A -- I don't recall the specifics of the 04:35:18

15 other few privileged conversations that I had, but 04:35:23

16 it's likely there would be -- would have been some 04:35:26

17 discussion by some person in that meeting on that 04:35:29

18 topic. 04:35:31

19 Q (BY MR. JUDAH) So focusing on the first of 04:35:32

20 those other meetings that you can remember, who 04:35:34

21 attended that meeting? 04:35:37

22 A So of the other meetings other than the 04:35:38

23 one I described at the MoFo office, generally the 04:35:41

24 attendees at these meetings would have included 04:35:45

25 Nicole Bartow and Aaron from Uber. Eric Tate and 04:35:50

1 Rudy Kim from MoFo. 04:35:57

2 Q Do you remember anyone else attending any 04:36:02

3 of those meetings that you attended where 04:36:04

4 Mr. Levandowski also attended and the subject matter 04:36:07

5 of communications related in any way to 04:36:12

6 Mr. Levandowski's reasons for downloading Waymo 04:36:16

7 files? 04:36:19

8 MR. TAKASHIMA: Objection, form. Again, 04:36:19

9 I'm going to caution the witness not to divulge any 04:36:23

10 privileged communications. If you understand that 04:36:25

11 question, you can answer it yes or no. 04:36:28

12 A So the only meetings that I can recall 04:36:31

13 where that topic may have come up are those handful 04:36:33

14 of privileged meetings that I attended along with 04:36:37

15 Anthony and the others I have mention -- I have 04:36:41

16 mentioned in that time period following the 04:36:43

17 commencement of the litigation. 04:36:46

18 Q (BY MR. JUDAH) Do you remember whether 04:36:49

19 there were -- well, let me -- let me go back one. 04:36:51

20 So with respect to this meeting that 04:36:56

21 you -- that you testified was kind of -- 04:37:00

22 Mr. Levandowski had some focused conversation on 04:37:02

23 this topic, you said it was a scheduled meeting, to 04:37:05

24 the best of your recollection, right? 04:37:10

25 A What do you mean by "scheduled"? 04:37:12

1 Q Well, that's what I'm trying to find out. 04:37:14

2 And so here's -- here's kind of the nub of the 04:37:16

3 question: Is -- is -- was there any sort of e-mail 04:37:18

4 invitation or calendar invitation that you can 04:37:23

5 remember for that meeting? 04:37:28

6 MR. TAKASHIMA: Objection, form. 04:37:29

7 A I don't recall how that meeting was 04:37:31

8 scheduled. 04:37:33

9 Q (BY MR. JUDAH) So there -- there may have 04:37:35

10 been a calendar invite, but there may not have been; 04:37:36

11 you just don't remember? 04:37:39

12 MR. TAKASHIMA: Objection, form. 04:37:41

13 A And so I don't remember how that meeting 04:37:43

14 was scheduled, so I -- I -- I don't know. 04:37:44

15 Q (BY MR. JUDAH) But -- but one of the ways 04:37:47

16 that meetings are scheduled that you attend in your 04:37:49

17 work at Uber is through calendar invitations, right? 04:37:52

18 A That is one way that meetings are 04:37:55

19 scheduled. 04:37:57

20 Q So that meeting could have been through a 04:37:57

21 calendar invitation, but you just don't remember one 04:37:59

22 way or the other? 04:38:04

23 MR. TAKASHIMA: Objection, form. 04:38:05

24 A Yeah, I don't remember. 04:38:06

25 Q (BY MR. JUDAH) And now focusing on those 04:38:08

1 other meetings that you mentioned, the ones that you 04:38:10  
2 remember Ms. Bartow, Mr. Bergstrom, Mr. Tate, and 04:38:15  
3 Mr. Kim attended, and Mr. Levandowski, do you 04:38:19  
4 remember any of those had calendar invitations or 04:38:22  
5 e-mails that scheduled them? 04:38:28

6 MR. TAKASHIMA: Objection, form. 04:38:29

7 A No, I don't remember how those meetings 04:38:32  
8 were scheduled. 04:38:34

9 Q (BY MR. JUDAH) So focusing now on the time 04:38:37  
10 period -- well, I'll just ask this for form sake. 04:38:39

11 What do you remember about the subject 04:38:43  
12 matter being discussed at those -- any of those 04:38:44  
13 meetings relating to Mr. Levandowski's reasons for 04:38:48  
14 downloading Waymo files? 04:38:53

15 MR. TAKASHIMA: I'm going to instruct the 04:38:55  
16 witness not to answer based on privilege. 04:38:56

17 Q (BY MR. JUDAH) Are you going to follow 04:38:57  
18 that instruction? 04:38:59

19 A Yes. 04:39:00

20 Q So now focusing on the time period before 04:39:00  
21 you became an Uber employee, have you ever had any 04:39:02  
22 conversations with Mr. Levandowski relating to the 04:39:05  
23 subject matter of his reasons for downloading Waymo 04:39:08  
24 files? 04:39:13

25 MR. TAKASHIMA: Objection, form. And I'm 04:39:15


1 I, MARY J. GOFF, CSR No. 13427, Certified  
2 Shorthand Reporter of the State of California,  
3 certify;

4 That the foregoing proceedings were taken  
before me at the time and place herein set forth, at  
5 which time the witness declared under penalty of  
6 perjury; that the testimony of the witness and all  
7 objections made at the time of the examination were  
recorded stenographically by me and were thereafter  
8 transcribed under my direction and supervision; that  
9 the foregoing is a full, true, and correct  
10 transcript of my shorthand notes so taken and of the  
testimony so given;

11 That before completion of the deposition,  
12 review of the transcript ( ) was (XX) was not  
13 requested: ( ) that the witness has failed or  
refused to approve the transcript.

14 I further certify that I am not financially  
15 interested in the action, and I am not a relative or  
16 employee of any attorney of the parties, nor of any  
17 of the parties.

18 I declare under penalty of perjury under the  
19 laws of California that the foregoing is true and  
20 correct, dated this 24th day of August 2017.

21  
22  
23  
24 

25 MARY J. GOFF, CSR No. 13427